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November 9, 2022

**VIA ECF**

Honorable Pamela K. Chen, United States District Judge  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. McMahon, et al.***  
**Docket No. 21-cr-265**

Dear Judge Chen,

As Your Honor is aware, this Firm represents Defendant Michael McMahon in the above-captioned matter. I write, with the consent of the Government, to respectfully request an additional one business day extension of time of the deadline for Mr. McMahon to file his reply brief in further support of his motion seeking a hearing with regard to the issues of Government misconduct alleged in our motion. Our reply is currently due this Thursday, November 10, 2022. However, yesterday, November 8, 2022, I had to undergo a minor surgical procedure which turned out to be somewhat more debilitating than expected; therefore, we are requesting an extension until Monday, November 14, 2022 (which is only one business day, given the holiday on Friday, November 11). Again, the Government has very graciously consented to this request, which we genuinely appreciate.

If this schedule meets with Your Honor's approval, we would request that the Court So Order the relief sought in the space provided and file it on the Docket at Your Honor's convenience. Of course, if the Court has any questions or concerns, please do not hesitate to contact me. Thank you very much for your very kind consideration of this matter.

Respectfully submitted,

s/ Lawrence Lustberg  
Lawrence S. Lustberg

**SO ORDERED:**

This \_\_\_\_ day of November, 2022

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Honorable Pamela K. Chen  
United States District Judge

cc: All counsel of record (via ECF)